

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THOMAS SIERRA

*Plaintiff,*

v.

REYNALDO GUEVARA, JOANN

HAVLORSEN as SPECIAL

REPRESENTATIVE for ERNEST

HALVERSEN, ANTHONY WOJCIK, JOHN

MCMURRAY, GEORGE FIGUEROA, EDWARD

MINGEY, ROBERT BIEBEL, FRANCIS

CAPPITELLI, UNKNOWN EMPLOYEES OF THE  
CITY OF CHICAGO, and the CITY OF CHICAGO

*Defendants.*

)  
) Case No. 1:18-cv-03029

)  
) Hon. Robert Blakey  
) District Judge  
)

**DEFENDANT GUEVARA'S UNOPPOSED MOTION TO EXTEND FILING  
DEADLINE**

Defendant Guevara moves this Court for an extension of time to file his motion for summary judgment by one week, with a filing deadline of February 2, 2024 and in support states as follows:

1. Plaintiff Thomas Sierra alleges that Defendant Guevara and other officers (who are represented by independent counsel) and the City of Chicago violated his constitutional rights under Title 18 United States Code Section 1983. The complaint specifically alleges various deprivations of constitutional process, including utilizing suggestive identification tactics, fabricating evidence and failing to disclose evidence, among other claims.

2. All defendants' motions for summary judgment are due to be filed on January 26, 2024. Defendant Guevara's counsel has been working closely with the co-defendant's counsel to

efficiently present their motions without repetitive arguments, unnecessary duplication or factual overlap.

3. At the same time, Defendant Guevara's lead attorney, has been out of town on numerous occasions, in connection with a family health matter and has thus been unable to devote the time and attention to preparing and finalizing Defendant Guevara's Motion for Summary Judgement.

4. Plaintiff's counsel has no objection to this Motion.

5. This Motion is not made for the purpose of delay and will not prejudice any party.

WHEREFORE, Defendant Guevara respectfully request this Court grant his Motion to Extend Filing of Guevara's Motion for Summary Judgement for one week until February 2, 2024.

Date: January 25, 2024

Respectfully Submitted,

DEFENDANT REYNALDO GUEVARA

/s/ Thomas More Leinenweber

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